

The Honorable Benjamin H. Settle

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT TACOMA

EAGLE HARBOR HOLDINGS, LLC, and  
MEDIUSTECH, LLC,

Plaintiffs,

v.

FORD MOTOR COMPANY,

Defendant.

Case No. 3:11-cv-05503-BHS

**PLAINTIFFS' UNOPPOSED  
MOTION TO SEAL DOCUMENTS**

**NOTE ON MOTION CALENDAR:  
March 5, 2014**

Pursuant to Local Civil Rule CR(5)(g), Plaintiffs Eagle Harbor Holdings, LLC, and MediusTech, LLC ("Plaintiffs") hereby submit this Unopposed Motion and [Proposed] Order to file under seal certain materials submitted with Plaintiffs' Opposition to Defendant Ford Motor Company's Rule 37 Motion to Strike.

The materials sought to be sealed are:

1. Plaintiffs' Brief in Opposition to Ford's Motion to Strike;
2. The Declaration of Paul S. Min in Opposition to Ford's Motion to Strike; and

*PLAINTIFFS' UNOPPOSED MOTION TO FILE  
DOCUMENTS UNDER SEAL  
Case No. 3:11-cv-05503-BHS  
Page 1 of 5*

SUSMAN GODFREY L.L.P.  
1201 Third Avenue, Suite 3800  
Seattle, WA 98101-3000  
Tel: (206) 516-3880; Fax: (206) 516-3883



E-Mail: fshort@susmangodfrey.com  
Genevieve Vose Wallace (WSBA No. 38422)  
E-Mail: gwallace@susmangodfrey.com  
Jordan Connors (WSBA No. 41649)  
E-Mail: jconnors@susmangodfrey.com  
E. Lindsay Calkins (WSBA No. 44127)  
E-Mail: lcalkins@susmangodfrey.com  
SUSMAN GODFREY L.L.P.  
1201 3rd Avenue, Suite 3800  
Seattle, WA 98101  
Tel: (206) 516-3861  
Fax: (206) 516-3883

*Counsel for Plaintiffs*

**CERTIFICATE OF SERVICE**

I hereby certify that on March 5, 2014, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all counsel of record who have registered for electronic notifications, and I caused the sealed documents to be served upon the following by email:

Duncan E. Manville  
**Savitt Bruce & Willey LLP**  
 1425 Fourth Ave, Suite 800  
 Joshua Green Building  
 Seattle, WA 98101  
 Tel: (206) 749-0500  
 Fax: (206) 838-2661  
 Email: [dmanville@sbwllp.com](mailto:dmanville@sbwllp.com)

Michael J. Summersgill  
 Sarah Beigbeder Petty  
 Rebecca Izzo  
 Michaela P. Sewall  
 Michael Heyison  
 Jonathan Woodard  
 Alexandra Amrhein  
**Wilmer Cutler Pickering Hale & Dorr LLP**  
 60 State Street  
 Boston, MA 02109  
 Tel: (617) 526-6000  
 Fax: (617) 526-5000  
 Emails: [michael.summersgill@wilmerhale.com](mailto:michael.summersgill@wilmerhale.com)  
[sarah.petty@wilmerhale.com](mailto:sarah.petty@wilmerhale.com)  
[rebecca.izzo@wilmerhale.com](mailto:rebecca.izzo@wilmerhale.com)  
[michaela.sewall@wilmerhale.com](mailto:michaela.sewall@wilmerhale.com)  
[michael.heyison@wilmerhale.com](mailto:michael.heyison@wilmerhale.com)  
[jonathan.woodard@wilmerhale.com](mailto:jonathan.woodard@wilmerhale.com)  
[alexandra.amrhein@wilmerhale.com](mailto:alexandra.amrhein@wilmerhale.com)

Todd C. Zubler  
 Grant K. Rowan  
 Elise Miller  
 Stuart Allen  
**Wilmer Cutler Pickering Hale & Dorr LLP**  
 1875 Pennsylvania Avenue NW  
 Washington, DC 20006  
 Tel: (202) 663-6636  
 Fax: (202) 663-6363  
 Emails: [grant.rowan@wilmerhale.com](mailto:grant.rowan@wilmerhale.com)  
[todd.zubler@wilmerhale.com](mailto:todd.zubler@wilmerhale.com)  
[elise.miller@wilmerhale.com](mailto:elise.miller@wilmerhale.com)  
[stuart.allen@wilmerhale.com](mailto:stuart.allen@wilmerhale.com)

David Smith  
**Wilmer Cutler Pickering Hale & Dorr LLP**  
 950 Page Mill Road  
 Palo Alto, CA 94304  
 Tel: (650) 858-6168  
 Fax: (650) 858 6100  
 Emails: [david.smith@wilmerhale.com](mailto:david.smith@wilmerhale.com)

Cosmin Maier  
**Wilmer Cutler Pickering Hale & Dorr LLP**  
 7 World Trade Center

Frank A. Angileri  
 John S. LeRoy  
 Amy C. Leshan  
**Brooks Kushman P.C.**

<p>250 Greenwich Street New York, New York 10007 Tel: (212)230-8816 Fax: (212) 230 8888 Emails: <a href="mailto:cosmin.maier@wilmerhale.com">cosmin.maier@wilmerhale.com</a></p>	<p>1000 Town Center, 22nd Floor Southfield, MI 48075 Tel: (248)358-4400 Fax: (248) 358-3351 Emails: <a href="mailto:fangileri@brookskushman.com">fangileri@brookskushman.com</a> <a href="mailto:jleroy@brookskushman.com">jleroy@brookskushman.com</a> <a href="mailto:aleshan@brookskushman.com">aleshan@brookskushman.com</a></p>
<p>Peter T. Petrich <b>DAVIES PEARSON P.C.</b> 920 Fawcett Ave. P.O. Box 1657 Tel: (253) 620-1500 Fax: (253) 572-3052 Email: <a href="mailto:ppetrich@dpearson.com">ppetrich@dpearson.com</a></p>	

/s/ Floyd G. Short